



**INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA - UAW**

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June 28, 2013

Kevin Fortkiewicz  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

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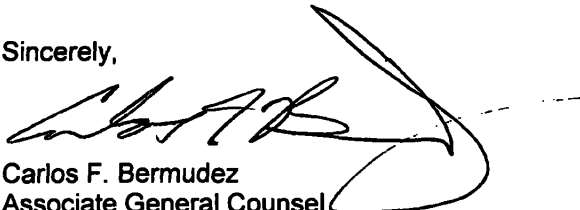
**Re: UAW V-CAP Amended 12 Day Pre-General  
Report Response**

Dear Mr. Fortkiewicz:

Your May 31, 2013 letter suggests that UAW V-CAP (C00002840) may have failed to file a 48 hour report with the FEC pursuant to 11 CFR § 104.4(b) and to fully itemize the expenditure on Schedule E of the next report to be filed by UAW V-CAP for two separate independent expenditures (lawn signs) totaling \$9,204.37 distributed in late 2012. UAW V-CAP, however, did file its 48 hour report and itemized the expenditure by amendment in January 2013. UAW V-CAP's filings were tardy due to an internal reporting error.

The independent expenditures were lawn signs distributed in October 2012 but the invoice was not issued and conveyed to the individual responsible for filing reports until January 2013. As a matter of process, notice is to be given to the individual responsible for filing independent expenditures prior to distribution of any lawn sign in instances where payment is due later than distribution so timely disclosures can be made. Here, prior notice was mistakenly not given despite the procedure and the omission was only discovered upon receipt of the invoice. Once this oversight was discovered, UAW V-CAP took prompt remedial action by filing 48 hour reports and amending its schedule E to properly itemize the expenditure. UAW V-CAP will take steps in the future to make certain that this error does not recur. We ask that you refrain from issuing any penalty or that you waive any penalty in light of V-CAP's responsive corrective action.

Sincerely,

  
Carlos F. Bermudez  
Associate General Counsel  
UAW V-CAP

CB/tf  
opeiu494

cc: Kim Geromin

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Federal Election Commission  
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